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NAME OF COMMITTEE (In Full)
Right to Rise USA

FEC IDENTIFICATION NUMBER
C00571372

Mailing Address 6230 WILSHIRE BLVD. PMB 1790

City	State	ZIP Code
LOS ANGELES	CA	90048

Dear Ms. Seufert:

This response pertains to the Reports Analysis Division's ("RAD") Request for Additional Information ("RAI") dated April 13, 2016, concerning Right to Rise USA's ("RTR") 2015 Year-End Report filed on January 31, 2016. The RAI requests clarification of several items, which are addressed in turn below.

- 1.This has been revised to "Get-out-the-vote consulting services" in an amended 2015 Year-End Report.
- 2.Memo items were not required because payments to original vendors did not exceed \$200 in a calendar year.
- 3.Kristopher Money was an independent contractor to RTR and any disbursements to him for travel did not require itemization in a memo entry.
- 4.These were expenditures for national cable media buys on the Fox News network that were not specific to any state. Unlike broadcast media buys made on a local-affiliate basis, these buys were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing make it impossible to itemize such buys on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements.
- 5.The independent expenditures cited in the attachment did not aggregate to \$10,000 or more with respect to any given election. Accordingly, RTR was not required to file 48-hour independent expenditure reports for these disbursements.